

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

TINA GRANT, individually and on behalf of all others similarly situated)	
)	
Plaintiff,)	CASE NO: 4:16-cv-00696
)	
v.)	Judge Catherine D. Perry
)	
EQUIFAX WORKFORCE SOLUTIONS a/k/a)	
TALX CORPORATION,)	
)	
Defendant.)	
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BETZALEL YOCHANAN, individually and on behalf of all others similarly situated,)	
)	
Plaintiff,)	CASE NO: 4:16-cv-00843
)	
v.)	
)	
EQUIFAX WORKFORCE SOLUTIONS a/k/a)	
TALX CORPORATION,)	
)	
Defendant.)	
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**DEFENDANT EQUIFAX WORKFORCE SOLUTIONS’
MOTION TO DISMISS GRANT AND YOCHANAN COMPLAINTS**

NOW COMES, Defendant Equifax Workforce Solutions a/k/a Talx Corporation (“EWS”), by counsel, and pursuant to Federal Rules of Civil Procedure 12(b)(1) and (b)(6), and hereby Moves to Dismiss both (1) Plaintiff Tina Grant’s Class Action Complaint (ECF No. 1, 4:16-cv-00696); and (2) Plaintiff Betzalel Yochanan’s Class Action Complaint (ECF No. 1, 4:16-cv-00843).¹

¹ This Court consolidated the *Grant* and *Yochanan* cases on the parties’ joint motion on July 8, 2016. *See* ECF No. 5.

In support of this Motion, Defendant EWS submits its Memorandum of Law in Support of the Motion, filed contemporaneously herewith, and incorporates the same as if fully set forth herein.

WHEREFORE, Defendant Equifax Workforce Solutions a/k/a Talx Corporation respectfully requests that this Court GRANT the instant Motion to Dismiss, and dismiss Plaintiff Grant's Complaint and Plaintiff Yochanan's Complaint.

Respectfully submitted,

Date: August 12, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2016, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, by which notification of such filing was electronically sent and served to the following:

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